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11 Attorneys for MCA Fund ADV Inc.

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14 **UNITED STATES BANKRUPTCY COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION**

16 In re

17 THE LITIGATION PRACTICE GROUP,
18 P.C.,

19 Debtor.

20 RICHARD A. MARSHACK, solely in his
21 capacity as chapter 11 trustee,

22 Plaintiff,

23 vs.

24 Delphine Pastor aka Delphine Pastor-Reiss
25 aka Delphine Reiss, a Monaco resident;
26 MCA Fund ADV Inc., a New York
27 Corporation; LDR International LTD., a
28 British Virgin Islands limited liability
company; and DOES 1-10, inclusive

Defendants.

Case No. 8:23-bk-10571-SC
Chapter 11

Adv. No. 25-01192

**NOTICE OF APPEARANCE AND
REQUEST FOR SPECIAL NOTICE AND
SERVICE OF PAPERS, AND REQUEST FOR
INCLUSION ON MASTER MAILING LIST**

26 Defendant MCA Fund ADV Inc., through its undersigned counsel, requests that all notices
27 given or required to be given and all papers served or required to be served by U.S. Mail and by email
28 in the above-captioned case be given to and served upon:

1 Ira D. Kharasch
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10 This request encompasses all notices, copies and pleadings referred to in section 1109(b) of
11 Title 11, United States Code or in rules 2002, 3017, or 9007 of the Federal Rules of Bankruptcy
12 Procedure (the “Bankruptcy Rules”), including, without limitation, any and all notices of any orders,
13 motions, demands, complaints, petitions, pleadings, plans of reorganization, disclosure statements,
14 requests, or applications, and any other documents brought before this Court in these cases, whether
15 formal or informal, written or oral, or transmitted or conveyed by mail, hand delivery, delivery service,
16 email, telephone, fax, telex, or otherwise which affect or seek to affect these cases.

17 This Notice of Appearance and Request for Notices is not, and shall not be deemed or
18 construed to be, a waiver of any of MCA Fund ADV Inc.’s substantive or procedural rights, including
19 without limitation, MCA Fund ADV Inc.’s rights: (i) to have final orders in noncore matters entered
20 only after de novo review by a United States district judge; (ii) to trial by jury in any proceedings so
21 triable in these cases or in any case, controversy, or proceeding related to these cases; (iii) to have a
22 District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal;
23 (iv) to contest jurisdiction or venue in these cases or in any case, controversy, or proceeding related to
24 these cases; (v) to have documents served in accordance with Bankruptcy Rule 7004 and Rule 4 of the
25 Federal Rules of Civil Procedure; or (vi) to any rights, claims, actions, defenses, setoffs, or
26 recoupments to which MCA Fund ADV Inc. is or may be entitled, under any agreements, in law, in
27 equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments are
28 expressly reserved.

29 Dated: April 28, 2024

PACHULSKI STANG ZIEHL & JONES LLP

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30 */s/ Ira D. Kharasch*
31 Ira D. Kharasch (CA Bar No. 109084)
32 Victoria A. Newmark (CA Bar No. 183581)

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Counsel for MCA Fund ADV Inc.